

LAW OFFICE OF AMY JANE AGNEW

Honorable Loretta A. Preska
Senior Justice, United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

March 1, 2023

VIA ECF

Re: *Allen, et al. v. NYS DOCCS, et al.*, 19-cv-8173 (LP)(SN)

Dear Judge Preska:

I write on behalf of Parties to apprise the Court of the status of discovery. The parties had a robust meet and confer today and agreed to proceed with liability discovery while the injunction and certification motions remain pending. We have scheduled the depositions of the Plaintiffs who have yet to be deposed as well as several Defendants. In light of the pending motions, we have agreed for the time being to forego a formal scheduling order or discovery end date as the resolution of the pending motions may prompt additional needs.

With thanks for the Court's continuing courtesies.

Very truly yours,

/s/ AJ Agnew

Amy Jane Agnew, Esq.